

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

AECOM ENERGY & CONSTRUCTION,
INC.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,
Defendant.

Case No. 20-2016 C

JOINT STATUS REPORT

Plaintiff AECOM Energy & Construction, Inc., formerly known as URS Energy & Construction, Inc., (URS) and Defendant the United States of America (Government) submit this Joint Status Report pursuant to the Court's Amended Discovery Scheduling Order. *See* ECF No. 23.

Since the September 30, 2022 Joint Status Report, the Government has agreed to perform additional searches and make additional document productions in connection with the parties' meet-and-confer process, which addressed the scope of the Government's collection, review, and production, including the Government's proposed custodian and search terms. To date, these additional searches have yielded a significant volume of documents –multiple terabytes of data – which the Government is still processing and preparing for production. The Government anticipates being substantially complete with its document productions following service of these additional document productions arising out of the parties' ongoing meet-and-confer process.

The Government is still processing and preparing for production the documents referenced in our previous status report; the amount of data the Department of Justice received from the agency turned out to be more voluminous than previously understood. As a result, the Government has not made any additional productions since the September 30, 2022 Joint Status

Report. The Government's related collection and review efforts are underway, and it anticipates making additional document productions in the first quarter of 2023.

The parties anticipate noticing depositions after the Government completes its document productions. URS also will address any remaining deficiencies in the Government's collection and production obligations, if necessary. The Government has worked cooperatively with the plaintiff to resolve what the plaintiff contends are deficiencies in the Government's document collection process. In doing so, the Government in no way concedes that there have been deficiencies and will respond at the appropriate time to any such allegations by the plaintiff.

In light of the Government's ongoing document productions, the parties intend to jointly move for a modification of the Court's Amended Discovery Scheduling Order.

December 29, 2022

Respectfully submitted,

/s/ Charles C. Speth

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